

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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SUPERB MOTORS INC., TEAM AUTO SALES LLC, ROBERT ANTHONY URRUTIA, 189 SUNRISE HWY AUTO LLC, NORTHSORE MOTOR LEASING, LLC, BRIAN CHABRIER, individually and derivatively as a member of NORTHSORE MOTOR LEASING, LLC, JOSHUA AARONSON, individually and derivatively as a member of 189 SUNRISE HWY AUTO, LLC, JORY BARON, 1581 HYLAN BLVD AUTO LLC, 1580 HYLAN BLVD AUTO LLC, 1591 HYLAN BLVD AUTO LLC, 1632 HYLAN BLVD AUTO LLC, 1239 HYLAN BLVD AUTO LLC, 2519 HYLAN BLVD AUTO LLC, 76 FISK STREET REALTY LLC, 446 ROUTE 23 AUTO LLC and ISLAND AUTO MANAGEMENT, LLC,

**Case No.: 2:23-cv-6188 (JMW)**

**SUPPLEMENTAL DECLARATION  
OF ROBERT ANTHONY URRUTIA  
IN FURTHER SUPPORT OF THE  
SUPERB PLAINTIFFS' ORDER TO  
SHOW CAUSE TO MODIFY THE  
PRELIMINARY INJUNCTION**

Plaintiffs,

-against-

ANTHONY DEO, SARAH DEO, HARRY THOMASSON, DWIGHT BLANKENSHIP, MARC MERCKLING, MICHAEL LAURIE, THOMAS JONES, CPA, CAR BUYERS NYC INC., GOLD COAST CARS OF SYOSSET LLC, GOLD COAST CARS OF SUNRISE LLC, GOLD COAST MOTORS AUTOMOTIVE GROUP LLC, GOLD COAST MOTORS OF LIC LLC, GOLD COAST MOTORS OF ROSLYN LLC, GOLD COAST MOTORS OF SMITHSTOWN LLC, UEA PREMIER MOTORS CORP., DLA CAPITAL PARTNERS INC., JONES, LITTLE & CO., CPA'S LLP, FLUSHING BANK, LIBERTAS FUNDING LLC, and J.P. MORGAN CHASE BANK, N.A.,

Defendants.

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Robert Anthony Urrutia declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am the President of Superb Motors Inc. (“Superb”) and the sole member of Team Auto Sales LLC (“Team”).<sup>1</sup>

2. Superb, Team, and I (the “Superb Plaintiffs”) consist of one group of Plaintiffs in this case who have been defrauded and harmed by Defendant Anthony Deo (“Deo”) and his cohort.

3. As such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge and a review of documents I maintain at Superb and Team in addition to information I have learned from employees, customers, vendors, and other third parties concerning the Defendants and their conduct.

4. I respectfully submit this supplemental declaration in further support of the Superb Plaintiffs’ Order to show cause to modify the preliminary injunction pursuant to this Court’s Order dated April 29, 2025 directing them to declare in detail as to when and how they learned that their lease at the “Team Mitsubishi-Hartford” Lot would be terminated

5. Team Imports, LLC d/b/a Team-Mitsubishi Hartford (“Team Mitsubishi”) has a lease agreement with New Park Avenue Associates, LLC (“Landlord”) at 412 New Park Avenue, Hartford, CT (the “Hartford Premises”). See copy of original lease between Landlord and The Hartford Auto Group Inc. (the prior dealership at the Premises) annexed hereto as **Exhibit “A”** and an assignment of lease to Team Mitsubishi annexed hereto as **Exhibit “B.”**

6. Since July 2024, Team Mitsubishi has not been able to pay the rent it owes under the lease for reasons this Court has been previously made aware of.

7. The Landlord held off on enforcing the lease in July 2024 because I was attempting to sell the dealership and satisfy my rent obligations at closing.

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<sup>1</sup> I was also the owner of Volkswagen of Freehold in New Jersey, Team Mitsubishi-Hartford in Connecticut, and Team Nissan of Pittsfield, Massachusetts.

8. Unfortunately, I was unable to sell the dealership and, as a result, the Landlord subsequently decided to sell the Premises.

9. On or about April 1, 2025, a notice was issued by the Landlord's counsel terminating the lease due to non-payment since July 2024 and demanding that all vehicles be removed. See copy of notice annexed hereto as **Exhibit "C."**

10. I did not receive the notice on that date because I no longer have access to the e-mail address "tony@yourteamauto.com."

11. The Landlord subsequently contacted me a few weeks later to inquire about the notice and to demand that I comply with same.

12. I then contacted my attorney to ask him to make the instant Order to show cause.

13. Understandably, my counsel could not do so right away due to his schedule.

14. As set forth in my prior declaration, Nissan Motor Acceptance Company LLC d/b/a NMAC ("NMAC") is prepared to take possession of the Superb Injuncted Vehicles, as well as store and insure them until further Order of this Court.

15. For these reasons and those set forth in the moving papers, the Superb Plaintiffs respectfully request that this Court grant their Order to show cause.

16. I humbly thank this Court for its time and attention to this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 2, 2025.

*Robert Anthony Urrutia*  
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Robert Anthony Urrutia (May 2, 2025 17:48 EDT)  
Robert Anthony Urrutia